



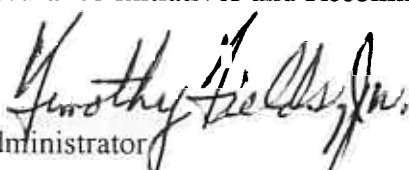
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

JUN 7 1999

OFFICE OF  
SOLID WASTE AND EMERGENCY  
RESPONSE

**MEMORANDUM**

**SUBJECT:** OSWER Quality Assurance Initiatives and Recommendations for Regional Implementation

**FROM:** Timothy Fields, Jr.   
Acting Assistant Administrator

**TO:** Assistant Regional Administrators  
Superfund National Policy Managers  
Regional, Science, and Technology Division Directors

**PURPOSE**

The purpose of this memorandum is to inform you of the Office of Solid Waste and Emergency Response (OSWER) initiatives related to Quality Assurance (QA), both in response to the Agency's Order 5360.1 CHG 1 (1998), *Policy and Program Requirements for the Mandatory EPA Quality System* and the audit report issued by the Office of Inspector General (OIG) on September 30, 1998, entitled "Superfund - EPA Had Not Effectively Implemented Its Superfund Quality Assurance Program." In addition, I received the January 27, 1999 "Advisory Report on the Need to Revise Quality Assurance Guidance for Superfund Removal Activities," citing the need for changes to meet Order 5360.1, CHG 1.

**BACKGROUND**

On July 16, 1998, EPA Order 5360.1, CHG 1, was issued and contains the minimum requirements for the mandatory Agency-wide Quality System. The Order clarifies the role of an Assistant Administrator in ensuring that all components and applicable programs in each National Program Office (AA-ship) comply with the Order. This Order further reinforces my belief that OSWER must modify its quality system and demonstrate that it is in compliance with Order 5360.1, CHG1.

The OIG report focused on both the Office of Research and Development's (ORD) Quality Assurance Division (QAD) and OSWER's Office of Emergency and Remedial Response

(OERR), or “Superfund.” It contained findings that generally indicated that the mandatory Agency-wide quality system requirements were not being fully implemented by Superfund.

OSWER was in agreement with most of the findings and determined that implementation of the recommendations directed toward OSWER/OERR would provide an opportunity to reinforce our strong support for appropriate quality management and to document it in a new Quality Management Plan (QMP), now under development. Since many of the OIG’s findings may also be applicable to other OSWER offices and in an effort to be proactive, I have decided to prepare an OSWER-wide QMP to ensure consistency and encourage overall improvements across OSWER programs.

## **OBJECTIVE**

We are starting to address a number of the OIG’s recommendations, in the short term with this memorandum. The OSWER QMP will address longer-term quality assurance issues. I have two objectives in mind as I provide you with this information: (1) to remind you of OSWER’s commitment to a strong quality management program which is our insurance policy for documenting appropriate and defensible decisions, and (2) to reconfirm my personal commitment to quality and, thus, provide an incentive for Regional management to reconfirm their commitment to quality management.

## **IMPLEMENTATION**

In order to be clear about how our quality initiatives relate to the OIG recommendations, am describing select findings/issues. I am not addressing all the recommendations in the report at this time, only those that require your immediate assistance and attention.

### **Issue 1:        Systematic Planning/Data Quality Objectives**

The OIG concluded that Superfund managers were not consistently implementing EPA’s policy to develop data quality objectives (DQOs) for environmental data collection activities. They attribute the lack of success for Superfund’s formal development of DQOs to the lack of sufficient direction and tools.<sup>1</sup>

- 1.A    **OIG Recommendation:** “In concert with QAD, develop and implement a plan to institutionalize the Superfund program’s data quality objectives process.”

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<sup>1</sup> Please note that Order 5360.1, CHG 1, requires “Use of a systematic planning approach to develop acceptance or performance criteria for all work covered by this Order.” For additional information, see section 3.3.8 of EPA Order 5360 (1998), *EPA Quality Manual for Environmental Programs*.

**OSWER/OERR Response:** OERR in concert with QAD just completed, *Data Quality Objectives Process for Hazardous Waste Site Investigations*, EPA/G-4HW, April 1999. I will be issuing this document to the Regions as a vehicle to institutionalize the data quality objective process for the Superfund program. Regions should also refer to the Agency's guidance, EPA/G-4, *Guidance for the Data Quality Objectives Process*, for guidance on one approach to systematic planning. Please refer to the EPA Order 5360, *EPA Quality Manual for Environmental Programs*, for the eight elements that must be addressed (e.g., identifying stakeholders, stating project goals and schedules, identifying data needs, etc.) for systematic planning.

**OIG Recommendation:** "Advocate the benefits of developing data quality objectives using an across-organization team approach."

**OSWER/OERR Response:** It is my understanding that the Regions generally recognize these benefits. It is critical for the Regions to proactively endorse, follow, and document a systematic planning process that involves all relevant parties (e.g., project management, contractors, State staff, hydrogeologists, risk assessors, statisticians, field engineers, QA personnel, and Regional laboratory staff) as early as possible. Needed site resources can be saved with up-front planning and coordination by targeting data collection activities, improving site characterizations, and focusing clean up activities.

**OIG Recommendation:** "Making automated tools (such as the Data Quality Objectives Decision Error Feasibility Trials - or "DEFT" - software or other interactive modeling software) available to appropriate staff and encouraging use through training and examples of success."

**OSWER/OERR Response:** QAD is developing a Windows version of the DEFT software, making it easier for project-specific use. When available QAD will distribute the software to the Regions. (If you are successfully using some other software for systematic planning, please provide Tony Jover via Email with the name and source.)

**OIG Recommendation:** "Increasing awareness as to what expertise is available to provide staff technical assistance in areas such as statistics either through realignment of Regional resources or contractor support."

**OSWER/OERR Response:** Technical assistance is available to Regions from numerous sources. First and foremost, utilize the expertise contained in the Regional, Science and Technology, Laboratory, and QA Staff. Staff expertise can also be accessed through: QAD, Regional contracts (e.g., ESAT), Interagency Agreements, and details or other temporary assignments.

Issue 2: Superfund QA Oversight

“The OIG concluded that OERR and Regional management had not uniformly ensured staff adequately performed Superfund QA oversight to ensure that environmental data were of known and adequate quality.” The OIG also reminds us that Order 5360.1, CHG 1 places National Program Managers and Regional Administrators in an oversight role.

- 2.A OIG Recommendation: “Develop a plan with a realistic cycle for OERR staff to perform management and technical assessments in the Regions. Include in the plan the staffing resources necessary to carry out the plan. Invite Regional Superfund and quality assurance managers to participate as members of OERR’s assessment team.”

OSWER/OERR Response: OERR QA staff has just completed a series of QA oversight reviews in the Regions. These visits are the first in a series of technical and management assessments and will be used to establish performance criteria for future assessments. Starting in late 1999 or early 2000, the plan is to perform assessments (using an OERR/Regional Superfund/Regional QA team) at all Regions and the Environmental Response Team Center over a 3 year period following a schedule which is currently under development.

- 2.B OIG Recommendation: “Continue conducting joint management assessments with QAD and obtain QAD Regional management assessment results to ensure that Regional Superfund staff satisfactorily perform their quality assurance activities.”

OSWER/OERR Response: I fully support the continuing collaboration between OERR (as well as other OSWER offices) and QAD in conducting joint management assessments and ensuring that Region specific findings are raised to appropriate Regional and OERR management.

- 2.C OIG Recommendation: “Develop an OSWER strategy to ensure corrective actions in response to OIG audits and EPA management assessments are fully implemented.”

OSWER Response: The OSWER QMP will include a strategy for ensuring corrective actions in response to OIG audits and other management assessments. A similar strategy should be reflected in your individual Regional QMPs. I am also asking, herein, that you provide a copy of your current **Regional strategy for corrective actions in response to OIG audits and management assessments (at least for OERR, but could include all programs)** to Stephen Luftig by August 13, 1999. In the future, corrective action strategies will be reviewed as part of OERR or OSWER QA reviews of each Region.

**Issue 3: Training of Staff and Superfund Management**

“OERR and Regional Administrators had not fully identified Superfund-specific quality assurance training needs and provided necessary training.”

- 3.A **OIG Recommendation:** “To provide senior OERR and Regional Superfund managers with sufficient training for them to understand the importance and necessity of the quality assurance program.”

**OSWER/OERR Response:** I strongly recommend that Regional Superfund managers enroll in QA training offered by QAD and by your own Region by the end of the calendar year. Furthermore, I will make sure that OERR managers also obtain appropriate QA training. (Although not required in the OIG response, I will recommend that managers in other OSWER programs obtain QA training.) OERR will also be tailoring the generic QA training materials developed by QAD for Superfund applications over the next year. The Regions will be notified when this training is available for Regional staff.

In closing, in order to strengthen and institutionalize the OSWER QA Program, I have established (under Tony Jover’s leadership) the Information Management and Data Quality (IMDQ) Staff in the Office of Program Management. The IMDQ Staff, working with the individual OSWER QA Managers and QA Staff, will develop the OSWER QMP and an associated schedule of assessments. Please provide your suggestions to Tony Jover (202/260-2387) or via E-mail as to how the IMDQ Staff can best support your Regional QA Programs. The immediate action item for the Regions is to submit your Regional strategy for corrective actions in response to OIG audits and management assessments to Stephen Luftig by August 13, 1999. Thank you for your help in improving EPA’s quality assurance programs.

cc: Nikki Tinsley, OIG  
Nancy Wentworth, ORD/QAD  
OSWER Office Directors  
Tony Jover, OSWER